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Attorneys for Defendant
EXPERIAN INFORMATION SOLUTIONS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NOEMIA CARVALHO,

Plaintiff,

v.

**CREDIT CONSULTING SERVICES, ET
AL.,**

Defendant.

Case No. C 08-01317-JF-HRL

**REQUEST OF DEFENDANT
EXPERIAN INFORMATION
SOLUTIONS, INC. TO APPEAR
TELEPHONICALLY AT HEARING
ON TRANSUNION'S MOTION TO
COMPEL; DECLARATION OF
DEANNA L. JOHNSTON IN
SUPPORT THEREOF**

Date: June 17, 2008
Time: 10:00 a.m.
Location: Courtroom 2

Defendant Experian Information Solutions, Inc. ("Experian") respectfully requests to appear telephonically at the hearing on Defendant TransUnion's Motion to Compel Production of Documents currently set for hearing on June 17, 2008, at 10:00 a.m. before the Honorable Howard R. Lloyd.

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1 Good cause exists to grant this request because counsel for Experian would be required to
2 travel from San Francisco, California to San Jose, California, such that Experian will incur
3 additional travel costs and attorney's fees at a time when Experian is attempting to minimize the
4 cost of litigation in this and numerous other matters. Experian is neither movant nor respondent
5 to the motion. Furthermore, all other parties in the case have similarly requested telephonic
6 appearances. Accordingly, counsel for Experian believes the objectives of this hearing will be
7 accomplished if Experian appears by telephone.

8 Dated: June 13, 2008

Respectfully submitted,

9 Jones Day

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11 By: /S/ Deanna L. Johnston

12 Deanna L. Johnston

13 Counsel for Defendant
14 EXPERIAN INFORMATION SOLUTIONS,
15 INC.
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DECLARATION OF DEANNA L. JOHNSTON

I, Deanna L. Johnston, hereby declare:

1. I am admitted to practice before this Court and am an associate with Jones Day, counsel for defendant Experian Information Solutions, Inc. ("Experian") in the above-captioned matter. I have personal knowledge of the facts stated herein and if called as a witness, I could and would competently testify thereto.

2. I am located at Jones Day's office in San Francisco, California. An in-person appearance at the hearing on TransUnion's Motion to Compel Production of Documents currently scheduled for June 17, 2008 would require me to travel by car to and from San Jose, California. I estimate the total time associated with traveling to and attending the hearing could exceed four hours at a time when Experian is attempting to minimize the cost of litigation in this and numerous other matters.

3. Experian is neither movant nor respondent to the motion. Furthermore, all other parties in the case have similarly requested telephonic appearances.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 13th day of June 2008.

/S/ Deanna L. Johnston

Deanna L. Johnston

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**CREDIT CONSULTING SERVICES, ET
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Defendant.

Case No. C 08-01317-JF-HRL

**[PROPOSED] ORDER GRANTING
REQUEST OF DEFENDANT
EXPERIAN INFORMATION
SOLUTIONS, INC. TO APPEAR
TELEPHONICALLY AT HEARING
ON TRANSUNION'S MOTION TO
COMPEL**

Date: June 17, 2008
Time: 10:00 a.m.
Location: Courtroom 2

1 The Request of Experian Information Solutions, Inc. ("Experian") to Appear
2 Telephonically at the Hearing on TransUnion's Motion to Compel came before the Honorable
3 Howard R. Lloyd of the above-captioned Court on or about June 13, 2008. After considering the
4 Request and good cause appearing,

5 IT IS HEREBY ORDERED that Deanna L. Johnston shall be permitted to appear via
6 telephone at the hearing on the Motion of TransUnion to Compel Production of Documents
7 currently scheduled for June 17, 2008 at 10:00 a.m.

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9 DATED: _____, 2008

The Honorable Howard R. Lloyd
United States Magistrate Judge

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